

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BETWEEN THE
DEBTORS AND THE CALIFORNIA
STATE AGENCIES EXTENDING TIME
TO FILE MOTION PURSUANT TO FED.
R. BANKR. P. 3018(a) AND AMENDING
AMENDED ORDER ESTABLISHING
SCHEDULE FOR DISCLOSURE
STATEMENT APPROVAL AND PLAN
CONFIRMATION**

Re: Dkt. No. 5732

[No Hearing Requested]

This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), and the California Department of Forestry and Fire Protection, California Department of Toxic Substances Control, California Governor’s Office of Emergency Services, California Department of Veterans Affairs, California State University, Chico, California Department of Parks and Recreation, California Department of Transportation, and California Department of Developmental Services (collectively, the “**California State Agencies**”). The Debtors and the California State Agencies are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On February 11, 2020, the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”) entered the *Amended Order Establishing Schedule for Disclosure Statement Approval and Plan Confirmation* [Docket No. 5732] (the “**Scheduling Order**”)¹, which, among other things, scheduled the deadline for any creditor to file a motion pursuant to Bankruptcy Rule 3018(a) seeking to temporarily allow its Claim or Interest in a different amount for purposes of voting to accept or reject the Plan as March 6, 2020, at 4:00 p.m. (Prevailing Pacific Time).

B. Counsel for the California State Agencies has requested, and counsel for the Debtors has agreed, that the time for the California State Agencies to file a motion pursuant to Bankruptcy Rule 3018(a) be extended.

//

//

¹ Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms in the Scheduling Order.

1 NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE
2 INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS
3 STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE
4 UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,
5 THAT:

6 1. The time for the California State Agencies to file and serve a motion pursuant to
7 Bankruptcy Rule 3018(a) is extended through 4:00 p.m. (Prevailing Pacific Time) on March 20,
8 2020.

9 2. Except as expressly set forth herein, all other provisions of the Scheduling Order
10 shall remain in full force and effect and shall not be impacted by this Stipulation.

11 3. This Stipulation shall constitute the entire agreement and understanding of the
12 parties relating to the subject matter hereof and shall supersede all prior agreements and
13 understandings relating to the subject matter hereof.

14 4. This Stipulation may be executed in counterparts, each of which shall be deemed
15 an original but all of which together shall constitute one and the same agreement.

16 5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
17 controversies arising from this Stipulation.

18 Dated: March 5, 2020

Dated: March 5, 2020

19 WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

20 /s/ Dara L. Silveira

/s/ Paul J. Pascuzzi

21 Dara L. Silveira

Paul J. Pascuzzi

22 *Attorneys for Debtors*
23 *and Debtors in Possession*

Attorneys for the California State Agencies